

EXHIBIT D

Steve W. Berman (*pro hac vice*)
 Craig R. Spiegel (SBN 122000)
 Ashley A. Bede (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1918 Eighth Avenue, Suite 3300
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
 steve@hbsslaw.com
 craigs@hbsslaw.com
 ashleyb@hbsslaw.com

Bruce L. Simon (SBN 96241)
 Aaron M. Sheanin (SBN 214472)
 Benjamin E. Shiftan (SBN 265767)
 PEARSON, SIMON & WARSHAW, LLP
 44 Montgomery Street, Suite 2450
 San Francisco, CA 94104
 Telephone: (415) 433-9000
 Facsimile: (415) 433-9008
 bsimon@pswlaw.com
 asheanin@pswlaw.com
 bshiftan@pswlaw.com

*Class Counsel for Jenkins and Consolidated
 Action Plaintiffs*

[Additional counsel listed on signature page]

Jeffrey L. Kessler (*pro hac vice*)
 David G. Feher (*pro hac vice*)
 David L. Greenspan (*pro hac vice*)
 Jennifer M. Stewart (*pro hac vice*)
 Joseph A. Litman (*pro hac vice*)
 WINSTON & STRAWN LLP
 200 Park Avenue
 New York, NY 10166-4193
 Telephone: (212) 294-6700
 Facsimile: (212) 294-4700
 jkessler@winston.com
 dfeher@winston.com
 dgreenspan@winston.com
 jstewart@winston.com
 jlitman@winston.com

Sean D. Meenan (SBN 260466)
 Jeanifer E. Parsigian (SBN 289001)
 WINSTON & STRAWN LLP
 101 California Street
 San Francisco, CA 94111
 Telephone: (415) 591-1000
 Facsimile: (415) 591-1400
 smeenan@winston.com
 jparsigian@winston.com

*Class Counsel for Jenkins and Consolidated
 Action Plaintiffs*

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

IN RE: NATIONAL COLLEGIATE
 ATHLETIC ASSOCIATION ATHLETIC
 GRANT-IN-AID CAP ANTITRUST
 LITIGATION

Case No. 4:14-md-02541-CW
 Case No. 4:14-cv-02758-CW

**STIPULATION AND [PROPOSED] ORDER
 REGARDING THIRD ADDENDUM TO
 STIPULATED PROTECTIVE ORDER**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

1 All parties, by their respective counsel, hereby agree and stipulate to this proposed Third
 2 Addendum to the “Stipulated Protective Order Regarding Confidentiality of Documents and
 3 Materials” (the “Protective Order”) (Dkt. 189) entered by the Court on January 15, 2015:

4 1. The Second Addendum to Stipulated Protective Order (Dkt. 508) was negotiated and
 5 signed between Plaintiffs and only five of the Conference Defendants in the Consolidated Action:
 6 (1) Atlantic Coast Conference; (2) The Big Ten Conference, Inc.; (3) The Big 12 Conference, Inc.;
 7 (4) Pac-12 Conference; and (5) Southeastern Conference. The parties now wish for the Court to
 8 order this stipulated addendum such that the Second Addendum to Stipulated Protective Order
 9 applies to the six other Conference Defendants in the Consolidated Action and the National
 10 Collegiate Athletic Association (“NCAA”). The six other Conference Defendants in the
 11 Consolidated Action are: (1) the American Athletic Conference; (2) Conference USA; (3) the Mid-
 12 American Conference; (4) the Mountain West Conference; (5) the Sun Belt Conference; and (6) the
 13 Western Athletic Conference (collectively, the “Six Conferences”).

14 2. By way of this stipulation, the Six Conferences in the Consolidated Actions and the
 15 NCAA shall have the same rights and obligations under the Second Addendum to Stipulated
 16 Protective Order as the Conference Defendants who negotiated and signed the Second Addendum to
 17 Stipulated Protective Order, and Plaintiffs will have the same rights and obligations with regard to
 18 the Six Conferences and the NCAA as they do with regard to the Conference Defendants who
 19 negotiated and signed the Second Addendum to the Stipulated Protective Order.

20 3. The Second Addendum to Stipulated Protective Order was signed by certain media
 21 networks that formally intervened into this litigation: (1) ESPN entities (ESPN, Inc., ESPN
 22 Enterprises, Inc., and American Broadcasting Companies, Inc.); (2) Fox entities (Fox Broadcasting
 23 Company, Fox Cable Networks, Inc., and Fox International Channels (US), Inc.); and (3) CBS
 24 Broadcasting Inc. (collectively, the “Network Intervenors”). By way of this stipulation, the rights
 25 and obligations of the Network Intervenors under the Second Addendum to Stipulated Protective
 26 Order will apply not just to the Network Intervenors but to all media networks (including their
 27 various entities, affiliates and assigns) that are partners of any of the eleven Conference Defendants
 28 in this litigation or the NCAA, and which have an interest in the litigation, regardless of whether

each has formally intervened in this litigation. Each such media network will be considered by the parties to be—and will receive the same treatment as—a Network Intervenor solely for purposes of the Second Addendum to Stipulated Protective Order and shall not otherwise be treated as having intervened in this litigation absent a formal motion to intervene by such network. However, nothing in this stipulation shall prevent any media network or any other party from intervening in this litigation.

IT IS SO STIPULATED.

Dated: November 11, 2016

Respectfully submitted,

By /s/ Steve W. Berman

Steve W. Berman (*pro hac vice*)
 Craig R. Spiegel (SBN 122000)
 Ashley A. Bede (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO
 LLP
 1918 Eighth Avenue, Suite 3300
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
steve@hbsslaw.com
craigs@hbsslaw.com
ashleyb@hbsslaw.com

Jeff D. Friedman (SBN 173886)
 HAGENS BERMAN SOBOL SHAPIRO
 LLP
 715 Hearst Avenue, Suite 202
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001
jefff@hbsslaw.com

By /s/ Bruce L. Simon

Bruce L. Simon (SBN 96241)
 Aaron M. Sheanin (SBN 214472)
 Benjamin E. Shiftan (SBN 265767)
 PEARSON, SIMON & WARSHAW, LLP
 44 Montgomery Street, Suite 2450
 San Francisco, CA 94104
 Telephone: (415) 433-9000
 Facsimile: (415) 433-9008
bsimon@pswlaw.com
asheanin@pswlaw.com
bshiftan@pswlaw.com

*Class Counsel for Jenkins and Consolidated
 Action Plaintiffs*

By /s/ Jeffrey L. Kessler

Jeffrey L. Kessler (*pro hac vice*)
 David G. Feher (*pro hac vice*)
 David L. Greenspan (*pro hac vice*)
 Jennifer M. Stewart (*pro hac vice*)
 Joseph A. Litman (*pro hac vice*)
 WINSTON & STRAWN LLP
 200 Park Avenue
 New York, NY 10166-4193
 Telephone: (212) 294-6700
 Facsimile: (212) 294-4700
jkessler@winston.com
dfeher@winston.com
dgreenspan@winston.com
jstewart@winston.com
jlitman@winston.com

Sean D. Meenan (SBN 260466)
 Jeanifer E. Parsigian (SBN 289001)
 WINSTON & STRAWN LLP
 101 California Street
 San Francisco, CA 94111
 Telephone: (415) 591-1000
 Facsimile: (415) 591-1400
smeenan@winston.com
jparsigian@winston.com

*Class Counsel for Jenkins and Consolidated
 Action Plaintiffs*

Elizabeth C. Pritzker (SBN 146267)
Jonathan K. Levine (SBN 220289)
Bethany L. Caracuzzo (SBN 190687)
Shiho Yamamoto (SBN 264741)
PRITZKER LEVINE LLP
180 Grand Avenue, Suite 1390
Oakland, California 94612
Telephone: (415) 692-0772
Facsimile: (415) 366-6110

Additional Class Counsel

POLSINELLI PC

By: /s/ Leane K. Capps
Leane K. Capps (*pro hac vice*)
Caitlin J. Morgan (*pro hac vice*)
2950 N. Harwood, Suite 2100
Dallas, TX 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
Email: lcapps@polsinelli.com
Email: cmorgan@polsinelli.com

Mit S. Winter (SBN 238515)
Amy D. Fitts (*pro hac vice*)
900 W. 48th Place
Kansas City, MO 64112
Telephone: (816) 753-1000
Facsimile: (816) 753-1536
Email: mwinter@polsinelli.com
Email: afitts@polsinelli.com

Wesley D. Hurst (SBN 127564)
2049 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: (310) 556-1801
Facsimile: (310) 556-1802
Email: whurst@polsinelli.com

Attorneys for Defendant
CONFERENCE USA

COVINGTON & BURLING LLP

By: /s/ Benjamin C. Block
Benjamin C. Block (*pro hac vice*)
One CityCenter
850 Tenth Street, N.W.
Washington, DC 20001-4956
Telephone: (202) 662-5205
Facsimile: (202) 778-5205
bblock@cov.com

Rebecca A. Jacobs (SBN 294430)
One Front Street
San Francisco, CA 94111-5356
Telephone: (415) 591-6000
Facsimile: (415) 591-6091
rjacobs@cov.com

Attorneys for Defendant
AMERICAN ATHLETIC
CONFERENCE

WALTER HAVERFIELD LLP

By: /s/ R. Todd Hunt
R. Todd Hunt (*pro hac vice*)
The Tower at Erieview
1301 E. 9th Street, Suite 3500
Cleveland, OH 44114-1821
Telephone: (216) 928-2935
Facsimile: (216) 916-2372
rthunt@walterhav.com

Attorneys for Defendant
MID-AMERICAN CONFERENCE

BRYAN CAVE LLP

By: /s/ Adam Brezine
Adam Brezine (SBN 220852)
560 Mission Street, 25th Floor
San Francisco, CA 94105
Telephone: (415) 674-3400
Facsimile: (415) 675-3434
adam.brezine@bryancave.com

Richard Young (*pro hac vice*)
Brent Rychener (*pro hac vice*)
90 South Cascade Avenue, Suite 1300
Colorado Springs, CO 80903
Telephone: (719) 473-3800
Facsimile: (719) 633-1518
richard.young@bryancave.com
brent.rychener@bryancave.com

Attorneys for Defendant
MOUNTAIN WEST CONFERENCE

JONES WALKER LLP

By: /s/ Mark A. Cunningham
Mark A. Cunningham (*pro hac vice*)
201 St. Charles Avenue
New Orleans, LA 70170-5100
Telephone: (504) 582-8536
Facsimile: (504) 589-8536
mcunningham@joneswalker.com

Attorneys for Defendant
SUN BELT CONFERENCE

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ Karen Hoffman Lent
Karen Hoffman Lent (*pro hac vice*)
Jeffrey A. Mishkin (*pro hac vice*)
Four Times Square
New York, NY 10036
Telephone: (212) 735-3000
Facsimile: (212) 735-2000
jeffrey.mishkin@skadden.com
karen.lent@skadden.com

Raoul D. Kennedy (SBN 40892)
525 University Avenue, Suite 1100
Palo Alto, CA 94301
Telephone: (650) 470-4500
Facsimile: (650) 470-4570
raoul.kennedy@skadden.com

Attorneys for Defendants
NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION
and
WESTERN ATHLETIC CONFERENCE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatory above.

/s/ Jeffrey L. Kessler
Jeffrey L. Kessler

1 IT IS SO ORDERED.

2
3 Dated:

4 _____
5 THE HON. NATHANAEL COUSINS
6 UNITED STATES DISTRICT COURT FOR THE
7 NORTHERN DISTRICT OF CALIFORNIA
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

11/11/2016	540	Order granting 539 Stipulation entered by Magistrate Judge Nathanael M. Cousins. (This is a text-only entry generated by the court. There is no document associated with this entry.) (Entered: 11/11/2016)
------------	-----	--